

**REDACTED**

V.C. Chemical Social Cir

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**BBL**<sup>®</sup>  
BLASLAND, BOUCK & LEE, INC.  
engineers, scientists, economists

*Transmitted Via First Class Mail*

December 9, 2005

Re: Soil Sampling Data Summary Report for  
724 East Hightower Trail, Social Circle, GA  
BBL Project #: 85533

Dear [REDACTED]

On September 6, 2005 and with your permission, Blasland, Bouck & Lee, Inc. (BBL) collected soil samples from your property located at 724 East Hightower Trail in Social Circle, Georgia. These activities were performed on behalf of Exxon Mobil Corporation (ExxonMobil) to provide data to evaluate the potential impacts of a former fertilizer manufacturing plant whose facilities appear to have been located on, or adjacent to, your property.

All soil samples collected were tested in the field to determine the approximate levels of arsenic and lead, which research has shown may be related to past operations of the former fertilizer plant. Based on these field test results, select samples were submitted to, and analyzed by, a laboratory approved by the United States Environmental Protection Agency (USEPA).

The purpose of this letter is to describe the soil sampling activities that were performed at your property and to present the results. Also included are photos of the inspection that was performed to document the condition of your property at the time of sampling (Attachment 1). Copies of this report are being submitted to the USEPA.

**Soil Sample Collection Activities**

Prior to sampling, the locations of underground utilities were identified by a utility locating service to minimize the possibility of disrupting services to the property and protect the safety of the workers.

Two types of soil samples were collected from your property as follows:

- Surface soil samples were collected from 0 to 6 inches below ground surface from one location in the front yard and three locations in the back yard. At each of the four locations, four additional samples were collected in a 10 foot radius at each location, mixed together in equal amounts, and then tested in the field to determine the approximate concentrations of arsenic and lead. Field testing was performed on the surface soil samples using a portable X-ray fluorescence (XRF) device. The surface soil samples were then sent to the laboratory for



analysis. All samples submitted to the laboratory were analyzed for metals (including arsenic and lead) and pH (soil acidity).

- Deeper soil samples were collected from one location in the front yard and three locations in the back yard. The locations of these deeper soil samples are shown on Figure 1. At each location, soil samples were collected from 0.5 to 2 feet, 2 to 4 feet, 4 to 6 feet, and 6 to 8 feet below ground surface. These samples were tested in the field using the XRF device described above to determine the approximate concentrations of arsenic and lead. Based on these results, select samples were sent to the laboratory and analyzed for metals (including arsenic and lead) and pH (soil acidity). Toxicity Characteristic Leaching Procedure (TCLP) arsenic and lead was performed on one soil sample exceeding the USEPA's soil screening levels for arsenic and/or lead. TCLP analysis results are used to determine disposal and treatment options for impacted soils.

A list of the soil samples collected from your property is provided in Table 1.

#### **Results of the Soil Sampling**

The USEPA has established screening levels (i.e., levels that trigger additional assessment and evaluation) for metals. The USEPA screening values for arsenic and lead are 27 milligrams per kilogram (mg/kg) and 400 mg/kg, respectively.

Arsenic was detected in all 13 soil samples collected from your property at concentrations up to 240 mg/kg, with two samples containing arsenic at concentrations greater than USEPA's screening level of 27 mg/kg (Table 2). Lead was detected in all 13 soil samples collected from your property at concentrations up to 5,480 mg/kg, with 3 samples containing lead at concentrations greater than USEPA's screening level of 400 mg/kg (Table 2). Antimony, iron, and vanadium were also detected above USEPA's screening levels in the samples collected from your property.

One soil sample exceeding the USEPA's soil screening levels was selected for TCLP analyses. TCLP lead was detected less than the regulatory limit of 5 mg/L; TCLP arsenic was not detected (Table 2).

Laboratory analytical results for the soil samples collected from your property are provided in Table 2.

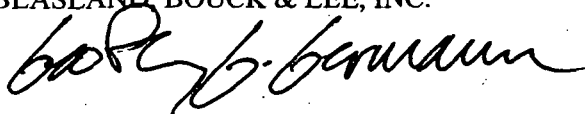
#### **Conclusion**

As described above, soil samples collected from your property contained concentrations of arsenic and lead above the USEPA's screening levels of 27 mg/kg and 400 mg/kg, respectively. Antimony, iron, and vanadium were also detected above USEPA's screening levels. ExxonMobil is submitting these results to the USEPA. We will work with these agencies to determine what further actions (if any) are necessary for your property, and will keep you informed. Any necessary actions for your property will be described in the upcoming *Removal Action Delineation Report/Removal Action Work Plan* that will be prepared by BBL on behalf of ExxonMobil and reviewed and approved by USEPA. This plan will be prepared upon completion of all sampling activities required by USEPA.

Thank you once again for granting ExxonMobil access to your property to conduct these soil sampling activities.

Sincerely,

BLASLAND BOUCK & LEE, INC.



Geoffrey G. Germann, P.E.  
Senior Engineer II

GGG/cbc

Enclosures:

Table 1 – Summary of Analytical Program for Samples Collected from 724 East Hightower Trail

Table 2 – Summary of Analytical Results for Detected Metals in Soil Samples Collected from 724 East Hightower Trail

Figure 1 – Sample Location Map 724 East Hightower Trail

Attachments:

Attachment 1 – Photographs

cc: D. Andrews, USEPA  
B. Frink, ExxonMobil  
R. Wallis, ExxonMobil  
M. Ross, ExxonMobil

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Information Redacted pursuant to 5 U.S.C.  
Section 552 (b)(6), Personal Privacy

Exemption 7 \_\_\_\_\_ (A) Interference with Enforcement Proceedings  
\_\_\_\_\_ (B) Right to Fair Trial  
☒ (C) Unwanted Invasion of Personal Privacy

## ***Tables***

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**Table 1**  
**Summary of Analytical Program for Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement			Comments
				Metals	pH	TCLP & Total Arsenic and Lead	
Front Yard Samples							
SCSB-724HT-4	0-0.5	09/06/05	X	X	X		Combination (composite) surface soil sample of five locations from the front yard.
SCSB-724HT-4	0.5-2	09/06/05	X	X	X		Soil sample collected from the front yard
SCSB-724HT-4	2-4	09/06/05	X	X	X		Soil sample collected from the front yard
SCSB-724HT-4	4-6	09/06/05	X				Soil sample collected from the front yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-724HT-4	6-8	09/06/05	X				Soil sample collected from the front yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
Back Yard Samples							
SCSB-724HT-3	0-0.5	09/06/05	X	X	X		Combination (composite) surface soil sample of five locations from the back yard.
SCSB-724HT-3	0.5-2	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-3	2-4	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-3	4-6	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-724HT-3	6-8	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-724HT-3-TCLP	0-0.5	09/06/05				X	Combination (composite) of soil samples at each depth interval
SCSB-724HT-2	0-0.5	09/06/05	X	X	X		Combination (composite) surface soil sample of five locations from the back yard.
SCSB-724HT-2	0.5-2	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-2	2-4	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-2	4-6	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-724HT-2	6-8	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

**Table 1**  
**Summary of Analytical Program for Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

Sample Name	Depth (feet)	Sample Date	Arsenic and Lead Field Measurement	Laboratory Measurement			Comments
				Metals	pH	TCLP & Total Arsenic and Lead	
SCSB-724HT-1	0-0.5	09/06/05	X	X	X		Combination (composite) surface soil sample of five locations from the back yard.
SCSB-724HT-1	0.5-2	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-1	2-4	09/06/05	X	X	X		Soil sample collected from the back yard
SCSB-724HT-1	4-6	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.
SCSB-724HT-1	6-8	09/06/05	X				Soil sample collected from the back yard not analyzed because arsenic and lead in the 2-4 foot interval were below USEPA screening levels.

**Notes:**

1. Samples depths are measured in feet below ground surface.
2. Laboratory measurements were performed by TestAmerica, Inc. of Nashville, Tennessee.
3. Sample locations are shown on Figure 1.

**Table 2**  
**Summary of Analytical Results for Detected Metals in Soil Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

Analyte	Screening Level	Units	Concentration in Sample:					
			SCSB-724HT-1	SCSB-724HT-1	SCSB-724HT-1	SCSB-724HT-2	SCSB-724HT-2	SCSB-724HT-2
			0 - 0.5 ft bgs 9/6/2005	0.5 - 2 ft bgs 9/6/2005	2 - 4 ft bgs 9/6/2005	0 - 0.5 ft bgs 9/6/2005	0.5 - 2 ft bgs 9/6/2005	2 - 4 ft bgs 9/6/2005
<b>Metals</b>								
Aluminum	76000	mg/kg	8190 J	9500 J	10500 J	4180 J	11500 J	11100 J
Antimony	31	mg/kg	3.16 J	1.83 J	1.13 J	45.7	4.25 J	1.95 J
Arsenic	27	mg/kg	12.2	2.07	4.4	240	22.6	7.55
Barium	5400	mg/kg	115	41.6	17.8	156	28.6	15.4
Beryllium	150	mg/kg	0.395 J	1.09 U	1.18 U	1.19 U	1.14 U	1.22 U
Cadmium	37	mg/kg	0.504 J	1.09 U	1.18 U	1.52	1.14 U	1.22 U
Calcium	--	mg/kg	2530	622	527	1920	324	135
Chromium	210	mg/kg	19.6 J	18.1 J	28.9 J	12.7 J	28.8 J	35.7 J
Cobalt	900	mg/kg	5.15	1.04 J	1.18 U	17.9	1.13 J	1.01 J
Copper	3100	mg/kg	32.4	9.54	18.5	727	122	67.6
Iron	23000	mg/kg	22600	17100	44700	91600	41000	57300
Lead	400	mg/kg	85.6	12.5	14.4	3840	117	81.2
Magnesium	--	mg/kg	1120	237	230	452	98.6	67.2
Manganese	1800	mg/kg	393 J	99.3 J	90.9 J	168 J	93.5 J	116 J
Mercury	23	mg/kg	0.0938 J	0.109 U	0.065 J	5.2	0.224	0.176
Nickel	1600	mg/kg	7.61	4.92	1.37	1.9	1.14 U	1.22 U
Potassium	--	mg/kg	1140	222	194	944	275	207
Selenium	390	mg/kg	2.21 UJ	2.19 UJ	2.35 UJ	7.6	2.27 UJ	2.44 UJ
Silver	390	mg/kg	1.1 U	1.09 U	1.18 U	7.03	1.14 J	1.22 U
Vanadium	78	mg/kg	37.1	30.6	75.3	31.4	65.1	91.7
Zinc	23000	mg/kg	193	18.3	17.4	835	54.7	33.4
<b>Metals-TCLP</b>								
Arsenic	5	mg/L	NA	NA	NA	NA	NA	NA
Lead	5	mg/L	NA	NA	NA	NA	NA	NA
<b>Miscellaneous</b>								
% Dry Solids	--	%	90.7	91.4	85.1	83.8	88	82
pH	--	pH Units	6.3	6.1	6.7	5.8	5.3	4.7



**Table 2**  
**Summary of Analytical Results for Detected Metals in Soil Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

Analyte	Screening Level	Units	Concentration in Sample:				
			SCSB-724HT-3	SCSB-724HT-3	SCSB-724HT-3	SCSB-724HT-3-TCLP	SCSB-724HT-4
			0 - 0.5 ft bgs 9/6/2005	0.5 - 2 ft bgs 9/6/2005	2 - 4 ft bgs 9/6/2005	0 - 0.5 ft bgs 9/6/2005	0 - 0.5 ft bgs 9/6/2005
<b>Metals</b>							
Aluminum	76000	mg/kg	14700 J	24500 J	12100 J	NA	15300
Antimony	31	mg/kg	3.97 J	1.67 J	2.92 J	NA	13.7
Arsenic	27	mg/kg	27	7.62	3.02	12.5	53.8
Barium	5400	mg/kg	59.9	27.8	16	NA	51.9
Beryllium	150	mg/kg	1.12 U	0.338 J	0.431 J	NA	1.12 U
Cadmium	37	mg/kg	1.12 U	1.13 U	1.13 U	NA	0.373 J
Calcium	--	mg/kg	589	90.2	60.1	NA	938
Chromium	210	mg/kg	24.5 J	38 J	28.3 J	NA	24.4
Cobalt	900	mg/kg	3.24	1.71	1.88	NA	1.93
Copper	3100	mg/kg	106	118	78.3	NA	38.8
Iron	23000	mg/kg	38200	67300	62300	NA	35200
Lead	400	mg/kg	1350	33.2	20.5	353	5480
Magnesium	--	mg/kg	272	223	91.7	NA	273
Manganese	1800	mg/kg	86.4 J	136 J	116 J	NA	120 J
Mercury	23	mg/kg	0.463	0.0738 J	0.118 U	NA	3.88
Nickel	1600	mg/kg	2.69	3.56	1.47	NA	2.24
Potassium	--	mg/kg	502	474	225	NA	401
Selenium	390	mg/kg	3.29 J	4.19 J	3.11 J	NA	4.53
Silver	390	mg/kg	1.21	1.13 U	1.13 U	NA	1.12 UJ
Vanadium	78	mg/kg	54.7	106	95.6	NA	57.4
Zinc	23000	mg/kg	55.7	35.2	21.4	NA	64 J
<b>Metals-TCLP</b>							
Arsenic	5	mg/L	NA	NA	NA	0.1 U	NA
Lead	5	mg/L	NA	NA	NA	2.5	NA
<b>Miscellaneous</b>							
% Dry Solids	--	%	88.9	84.5	84.5	88.2	89.6
pH	--	pH Units	5.1	4.4	4.4	NA	5.4



**Table 2**  
**Summary of Analytical Results for Detected Metals in Soil Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

Analyte	Screening Level	Units	Concentration in Sample:	
			SCSB-724HT-4	SCSB-724HT-4
			0.5 - 2 ft bgs 9/6/2005	2 - 4 ft bgs 9/6/2005
<b>Metals</b>				
Aluminum	76000	mg/kg	26000	15600
Antimony	31	mg/kg	1.42 J	11.9 U
Arsenic	27	mg/kg	4.4	3.91
Barium	5400	mg/kg	39	15.9
Beryllium	150	mg/kg	1.18 U	0.453 J
Cadmium	37	mg/kg	1.18 U	1.19 U
Calcium	--	mg/kg	344	218
Chromium	210	mg/kg	40.2	33.6
Cobalt	900	mg/kg	0.909 J	1.19 U
Copper	3100	mg/kg	22.2	32.7
Iron	23000	mg/kg	49500	60600
Lead	400	mg/kg	47.6	19.6
Magnesium	--	mg/kg	169	144
Manganese	1800	mg/kg	167 J	110 J
Mercury	23	mg/kg	0.132	0.0842 J
Nickel	1600	mg/kg	3.05	3.31
Potassium	--	mg/kg	291	205
Selenium	390	mg/kg	4.75	2.39 UJ
Silver	390	mg/kg	1.18 U	1.19 U
Vanadium	78	mg/kg	82.2	89.2
Zinc	23000	mg/kg	20.1 J	18.2 J
<b>Metals-TCLP</b>				
Arsenic	5	mg/L	NA	NA
Lead	5	mg/L	NA	NA
<b>Miscellaneous</b>				
% Dry Solids	--	%	84.8	83.7
pH	--	pH Units	4.9	5.1

**Table 2**  
**Summary of Analytical Results for Detected Metals in Soil Samples Collected from 724 East Hightower Trail**  
**Social Circle, Georgia**

**Notes:**

Shaded values exceed the site specific action level

bgs - below ground surface

J - estimated value

mg/kg - milligrams per kilogram

mg/L - milligrams per liter

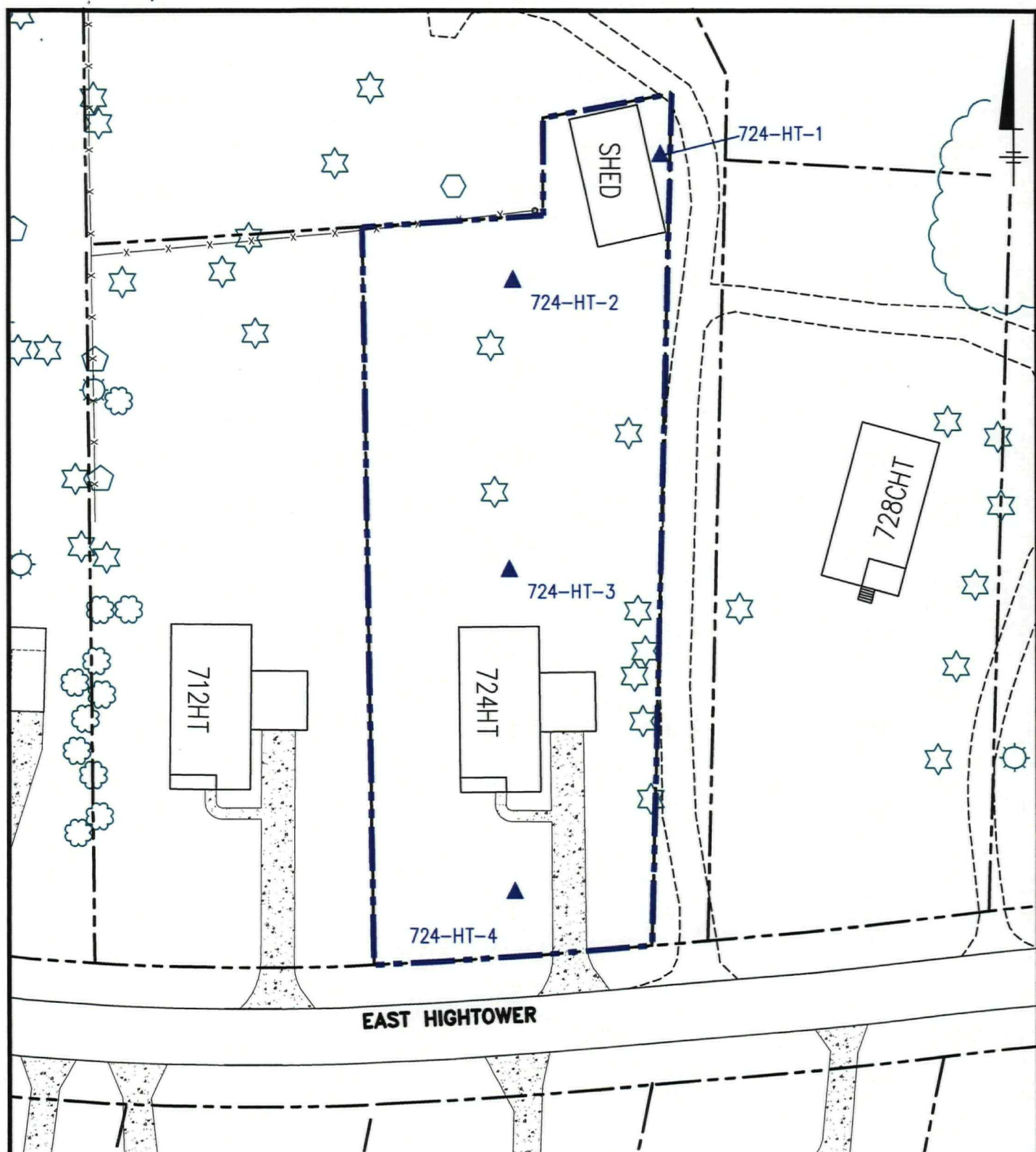
NA - not analyzed

U - not detected

-- no site-specific action level defined

***Figure***

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**LEGEND:**

--- PROPERTY LINE  
 --- CONCRETE  
 ---x--- FENCE LINE

▲ SOIL BORING LOCATION  
 ☆ TREES

0 50' 100'  
 GRAPHIC SCALE

EXXONMOBIL  
 VCC - SOCIAL CIRCLE, GEORGIA

**SAMPLE LOCATION MAP FOR  
 724 EAST HIGHTOWER**

**BBL**  
 BLASLAND, BOUCK & LEE, INC.  
 engineers, scientists, economists

FIGURE  
**724HT**

X: 85533XOP, X02.DWG  
 P: PLT-AP1  
 10/31/05 CAR-85-LEE  
 R: \CURRENT\OTHER\85533004\PR\85533G06.DWG



## ***Attachment***

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Attachment 1  
Photographs of 724 East Hightower Trail, Social Circle, GA



724 East Hightower Trail, southern edge looking north.



724 East Hightower Trail, eastern edge looking north.



Attachment 1  
Photographs of 724 East Hightower Trail, Social Circle, GA



724 East Hightower Trail, western edge looking south.



724 East Hightower Trail, western edge looking east.